1 2 3 4 5 6 7	Marvin A. Tenenbaum Berkeley Research Group, LLC 70 W. Madison, Suite 5000 Chicago, IL 60602 Tel: (312) 429-7900 Fax: (312) 637-4974 Email: mtenenbaum@thinkbrg.com Consultants to Receiver Thomas A. Seaman	
8	UNITED STATES	DISTRICT COURT
	CENTRAL DISTRIC	CT OF CALIFORNIA
10	WESTERN	DIVISION
11		
12	SECURITIES AND EXCHANGE COMMISSION,	Case No. 2:15-cv-07425 RGK GJS
13	Plaintiff,	FIRST INTERIM FEE APPLICATION OF BERKELEY
14	V.	RESEARCH GROUP, LLC
15	STEVE CHEN, USFIA, INC.,	Date: May 2, 2016 Time: 9:00 a.m.
16	STEVE CHEN, USFIA, INC., ALLIANCE FINANCIAL GROUP, INC., AMAUCTION, INC.,	Ctrm.: 850 Judge: Hon. R. Gary Klausner
17	GROUP, INC., AMAUCTION, INC., ABORELL MGMT I, LLC, ABORELL ADVISORS I, LLC, ABORELL	ouge. Home to our find the
18	REIT II, LLC, AHOME REAL ESTATE, LLC, ALLIANCE	
19	NGN, INC., APOLLO REIT I, INC., APOLLO REIT II, LLC, AMKEY, INC.,	
20	US CHINA CONSULTATION	
21	ASSOCIATION, and QUAIL RANCH GOLF COURSE, LLC,	
22	Defendants.	
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FIRST INTERIM FEE APPICATION OF BRG; CASE NO. CV15-07425 RGK (GJSX)

INTRODUCTION

Berkeley Research Group, LLC ("BRG"), consultants to Thomas Seaman, the court-appointed Receiver of Defendants USFIA, Inc., Alliance Financial Group, Inc., Amauction, Inc., Aborell Mgmt I, LLC, Aborell Advisors I, LLC, Aborell REIT II, LLC, Ahome Real Estate, LLC, Alliance NGN, Inc., Apollo REIT I, LLC, Apollo REIT II, LLC, Amkey, Inc., US China Consultation Association, and Quail Ranch Golf Club, LLC (collectively, the "Receivership Entities"), hereby submits this First Interim Application for Payment of Fees and Reimbursement of Expenses (the "Application"). The Application covers the period from September 28, 2015 through January 31, 2016 (the "Application Period").

As reflected below, during the Application Period, BRG incurred a total of 486.55 hours working on behalf of the Receivership Entities, at a weighted average rate of \$319 per hour, for professional fees totaling \$155,222.50. In addition, BRG incurred \$19,324.76 in expenses. In accordance with this Court's orders, BRG now requests that the Court approve the \$155,222.50 in fees and \$19,324.76 in expenses on an interim basis, and enter an Order authorizing the Receiver to pay 90% of the fees (\$139,700.25) and 100% of expenses incurred.

SERVICES PERFORMED DURING THE APPLICATION PERIOD

On or about September 28, 2015, the Court appointed Thomas Seaman on a temporary basis. The Receiver was authorized to, among other things, to (1) collect and take custody, control, and possession of all assets and premises of the Receivership Entities; (2) conduct such investigation and discovery as may be necessary to locate and account for all assets of or managed by the Receivership Entities; (3) take such action as is necessary and appropriate to preserve and take control of and to prevent the dissipation, concealment, or disposition of any assets of or managed by the Receivership Entities; (4) have access to and monitor all mail, electronic mail, and video phone of the Receivership Entities; and (4) to employ attorneys, accountants, consultants, and other persons to assist in such investigation

and discovery.

Accordingly, the Receiver immediately engaged BRG to perform data collection, preservation, retrieval, and analytics, as well as computer forensic services. The Receiver selected BRG due to the firm's extensive experience and expertise in receiverships as well as bankruptcy and litigation matters. Additionally, BRG, and specifically the team assigned to this matter, possess significant experience with corporate networks, data collection/preservation, databases and computer forensics. Reasonably detailed descriptions of the fees and expenses incurred by BRG are included in the invoices attached hereto as Exhibit A. Biographical information of the BRG professionals who performed such services is attached hereto as Exhibit B.

As summarized below, BRG provided services in the following categories during the Application Period:

- 1. Computer Network Survey and Repair
- 2. Forensic Preservation and Documentation
- 3. Data Processing and Searching
- 4. Database Analysis and Reporting

The Receiver instructed BRG to undertake these tasks, approved the amounts billed by BRG in connection with these tasks, and instructed BRG to prepare this Application. BRG completed these tasks as efficiently as possible given the time constraints, amount of data requested to be preserved, and analysis performed.

As described in more detail below, the USFIA network was especially difficult and time consuming to navigate due to, among other things, there being:

- No IT staff onsite to support the receiver or BRG's needs;
- A decentralized network of over 20 servers including multiple legacy servers and poorly configured RAID storage on newer servers;
- No passwords and credentials made available;
- A lack of network and system documentation;

- Foreign language materials requiring translation and interpretation; and
- Custom home grown applications/databases used to manage investors and contributions.

1. <u>Computer Network Survey and Repair</u>

BRG performed a survey of the USFIA facility's computer network and identified computers, servers, and network hardware. BRG reviewed located and reviewed documentation (to the extent available) and built an understanding of the physical layout and logical configuration of the computer servers and networking equipment. The USFIA IT staff members were not onsite, generally unavailable, and either lacked sufficient technical knowledge of the server environment and systems to be of assistance or appeared to intentionally withhold information that was known to them. Due to this, BRG was forced to break through server passwords to gain access to the networks/systems and develop an understanding of the network from the ground up. During the survey, all servers, computers, and networking hardware were completely shut down to prevent unauthorized access.

BRG performed an inventory of the servers to determine how they were used, what applications and services were resident, and what type of data they contained. In particular, BRG identified email, web, and database servers. BRG further identified the specific websites, mailboxes, and databases hosted by said servers. BRG also identified external websites in control of USFIA and redirected traffic away from those sites at the request of the Receiver.

The USFIA computer network was reinstated to a limited working condition once all computers and servers were forensically preserved. BRG isolated the network from external Internet access, reset passwords on servers and computers, and reconfigured networking equipment to allow for easier access to data by the Receiver.

In order to complete these activities, BRG staff was required to spend 98.30

hours resulting in fees in the amount of \$32,608.75.

2. Forensic Preservation and Documentation

BRG performed forensic data preservation on a total of 165 devices (including 128 PCs and 22 Servers) and in excess of 100 terabytes of total data, including servers, computers, mobile devices, and loose media such as thumb drives being used by USFIA, affiliates, and employees. Due to the inconsistent, decentralized, and poor configuration of the servers, the forensic preservation process was more complex and time consuming than expected for a similar sized company and operation. In particular, the existence of many legacy servers with outdated hardware and poorly configured RAID configurations of newer servers caused a significant increase in the forensic imaging time and delayed the completion of the forensic preservation.

The organization and condition of the network was unconventional and in disarray. BRG team members worked long hours—often late into the night—utilizing the advanced and efficient hardware and software technology to expedite the data preservation and collection efforts to accommodate the schedule and reporting requirements of the Receiver. In addition, most desktop computers contained larger than average hard drives which also increased the forensic imaging time. BRG also documented and took possession of an additional 75 items which consisted mostly of old hard drives found in the IT server room, saving time and resources. These items are currently secured in BRG's San Diego forensic lab.

In order to complete these activities, BRG staff was required to spend 255.50 hours resulting in fees in the amount of \$80,806.25.

3. <u>Data Processing and Searching</u>

BRG processed and indexed 6 computers, applied keyword searches, retrieved and exported documents at the request of the Receiver and his counsel. BRG also performed password cracking to allow the Receiver to access password protected Excel spreadsheets on Steve Chen's computers. Additionally, BRG performed a

forensic search of computers to identify the existence and use of web based email accounts used by former USFIA personnel.

In order to complete these activities, BRG staff was required to spend 50.50 hours resulting in fees in the amount of \$16,293.75.

5. Database Analysis and Reporting

BRG identified and surveyed databases running on the various servers used in the USFIA facility and discovered and gained access to databases used to record and manage investor activities. BRG then analyzed the USFIA and AMKEY databases to obtain an understanding of the structure and use of the database in order to produce reports to the Receiver regarding specific details and transactions. In this analysis and review, BRG reviewed hundreds of tables and analyzed database scripts and website code. These systems were home grown databases without any documentation or support.

BRG also analyzed the web interface, known as the BackOffice, used by former USFIA staff members to manage accounts, and the web interface used by investors, in order to identify how fields in the database were being used. Often times, the analysis of the databases' web components required Chinese translation performed by BRG. In order to complete these activities, BRG staff was required to spend 82.25 hours resulting in fees in the amount of \$25,513.75.

EXPENSES

In order to complete each of the above tasks, BRG incurred \$19,324.76 in expenses during the application period summarized as follows:

Description	Amount
Airfare	\$2,011.37
Lodging	\$6,000.37
Travel Meals	\$560.18

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Mileage	\$556.37
Ground Transportation	\$2,092.18
Admin Fee	\$7,761.14
Shipping	\$343.15
Total	\$19,324.76

The majority of expenses relate to 1. Travel to USFIA offices on multiple occasions by multiple BRG staff members due to the unique and complex computer network environment and expediency required 2. Lodging for specialized team members visiting USFIA offices as well as BRG members working long days and late into the night at USFIA offices to complete requested tasks and 3.5% standard admin fee which covers administrative, software, and equipment costs such as Network Attached Storage Devices, Certified Blank Hard Drives, Data Backup Systems, High Speed Network, Telecommunications, Internal Copying and Printing, Itemized Supplies, and specialized equipment and software.

BRG'S FEES AND EXPENSES ARE REASONABLE AND APPROPRIATE

The amounts sought in this Application are reasonable for the professional services performed by BRG on behalf of the Receiver and the Receivership Entities. BRG believes the services rendered constitute necessary and appropriate services to assist the Receiver in carrying out his duties and obligations. Moreover, BRG believes that the services rendered provided substantial benefit to the Received and the Receivership Entities and therefore respectfully submits that its fees and expenses are fair and reasonable and should be approved on an interim basis.

CONCLUSION

Accordingly, BRG respectfully requests that the Court enter an Order approving, on an interim basis, BRG's fees in the amount of \$155,222.50, its expenses in the amount of \$19,324.76, and authorizing the Receiver to pay BRG 90%

EXHIBIT A



Thomas Seaman Thomas Seaman Company 3 Park Plaza, Suite 550 Irvine, CA 92614

Via Email: tom@thomasseaman.com

October 26, 2015 Client-Matter: 7733-11355 Invoice #: 35562 Tax ID # 27-1451273

RE: SEC v. US Fine Investments Arts Inc

Services Rendered Through September 30, 2015

 Professional Services
 \$ 18,220.00
 USD

 Expenses Incurred
 1,052.35
 USD

 CURRENT CHARGES
 \$ 19,272.35
 USD

PAYMENT IS DUE BY November 25, 2015

Please direct questions regarding this invoice to: Michael Bandemer at (619) 823-8867 or mbandemer@thinkbrg.com.

Please remit payment by check to:

Berkeley Research Group, LLC 2200 Powell Street, Suite 1200 Emeryville, CA 94608 Please remit payment by wire or ACH to:

Bank Name: PNC Bank, N.A. SWIFT: PNCCUS33ENJ ABA #: 031207607

Account Name: Berkeley Research Group, LLC

Account #: 8026286672 Reference: 35562

Remittance advices are to be sent to:

remitadvice@thinkbrg.com



To: Thomas Seaman c/o: Thomas Seaman Company RE: SEC v. US Fine Investments Arts Inc Page 2 of 3 Invoice # 35562

Client-Matter: 07733-011355

Services Rendered Through September 30, 2015

DDO	EECCI	ΟΝΔΙ	CEDV	ICEC
PKII		CHUAL	SERV	

	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Managing Director Michael Bandemer	450.00	2.25	1,012.50
Senior Managing Consultant David Jimenez	325.00	29.50	9,587.50
Managing Consultant Darielle Delgado	300.00	25.40	7,620.00
Total Professional Services		57.15	18,220.00
EXPENSES			
Express Messenger/Shipping In-House Costs: Technology, Fax, Phone, Supplies & Photocopies			141.35 911.00
Total Expenses			1,052.35



To: Thomas Seaman Company RE: SEC v. US Fine Investments Arts Inc

Page 3 of 3 Invoice # 35562 Client-Matter: 07733-011355

Services Rendered Through September 30, 2015

DETAIL OF PROFESSIONAL SERVICES

<u>Date</u> 09/28/15	<u>Name</u> Michael Bandemer	<u>Description</u> Develop work plan. Coordinate preservation and direct team onsite.	<u>Hours</u> 1.25
09/28/15	Darielle Delgado	Prepare equipment for collection	2.60
09/28/15	David Jimenez	Preparing for collection and onsite preservation.	3.50
09/29/15	Michael Bandemer	Coordinate preservation and direct team onsite.	0.50
09/29/15	Darielle Delgado	Travel to and perform onsite collection	2.80
09/29/15	Darielle Delgado	Onsite preservation and collection. Takedown network and websites.	6.00
09/29/15	David Jimenez	Performing onsite forensic collection.	11.00
09/30/15	Michael Bandemer	Coordinate preservation and direct team onsite. Develop priorities.	0.50
09/30/15	Darielle Delgado	Onsite collection.	14.00
09/30/15	David Jimenez	Performing on site forensic collection.	15.00
Professional S	ervices	<u> </u>	57.15



Thomas Seaman Thomas Seaman Company 3 Park Plaza, Suite 550 Irvine, CA 92614

Via Email: tom@thomasseaman.com

November 19, 2015 Client-Matter: 7733-11355 Invoice #: 36524 Tax ID # 27-1451273

RE: SEC v. US Fine Investments Arts Inc

Services Rendered Through October 31, 2015

Professional Services \$ 84,613.75 USD Expenses Incurred 7,021.54 CURRENT CHARGES \$ 91,635.29 USD

OUTSTANDING INVOICES

Invoice # 35562 - Dated 10/26/15 19,272.35

BALANCE DUE \$ 110,907.64 USD

PAYMENT IS DUE BY December 19, 2015

Please direct questions regarding this invoice to: Michael Bandemer at (619) 823-8867 or mbandemer@thinkbrg.com.

Please remit payment by check to:

Berkeley Research Group, LLC 2200 Powell Street, Suite 1200 Emeryville, CA 94608

Please remit payment by wire or ACH to:

Bank Name: PNC Bank, N.A. SWIFT: PNCCUS33ENJ ABA #: 031207607

Account Name: Berkeley Research Group, LLC

Account #: 8026286672 Reference: 36524

Remittance advices are to be sent to:

remitadvice@thinkbrg.com



To: Thomas Seaman
c/o: Thomas Seaman Company
RE: SEC v. US Fine Investments Arts Inc

Page 2 of 4 **Invoice #** 36524

Client-Matter: 07733-011355

Services Rendered Through October 31, 2015

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PROFESSIONAL SERVICES	Rate	Hours	Amount
Managing Director	nate	<u>nouis</u>	Amount
Michael Bandemer	450.00	11.25	5,062.50
Wichael Bandemei	450.00	11.25	3,002.30
Senior Managing Consultant			
Dean G. Christopher	325.00	21.00	6,825.00
Craig Fennell	325.00	2.25	731.25
David Jimenez	325.00	139.00	45,175.00
Managing Consultant			
Darielle Delgado	300.00	89.40	26,820.00
Total Professional Services		262.90	84,613.75
EXPENSES			
1.1.1.02.0			
Express Messenger/Shipping			163.05
Meals - Other (100% Deductible)			173.92
Travel - Hotel/Lodging			1,974.15
Travel - Mileage			374.67
Travel - Parking			81.00
Travel - Taxi, Car Rental, Toll, Train			24.06
In-House Costs: Technology, Fax, Phone, Supplies & Photocopies			4,230.69
Total Expenses			7,021.54



To: Thomas Seaman c/o: Thomas Seaman Company

Invoice # 36524 RE: SEC v. US Fine Investments Arts Inc **Client-Matter:** 07733-011355

Services Rendered Through October 31, 2015

DETAIL OF PROFESSIONAL SERVICES

<u>Date</u> 10/01/15	<u>Name</u> Dean G. Christopher	<u>Description</u> On-site imaging at Gemcoin offices.	<u>Hours</u> 13.50
10/01/15	Darielle Delgado	Onsite preservation.	12.00
10/01/15	David Jimenez	Performing on site preservation.	13.00
10/02/15	Dean G. Christopher	On-site imaging at Gemcoin offices.	7.50
10/02/15	Darielle Delgado	Onsite preservation.	12.00
10/02/15	David Jimenez	Performing on site preservation.	10.00
10/05/15	Michael Bandemer	Direct collection and preservation.	0.50
10/05/15	Darielle Delgado	Onsite preservation.	11.00
10/05/15	David Jimenez	Performing on site forensic collection.	8.00
10/06/15	Michael Bandemer	Direct collection and preservation.	0.50
10/06/15	Darielle Delgado	Onsite preservation.	14.00
10/06/15	David Jimenez	Performing on site forensic collection.	14.00
10/07/15	Darielle Delgado	Onsite preservation.	8.00
10/07/15	David Jimenez	Performing on site forensic collection.	10.00
10/08/15	Darielle Delgado	Onsite preservation.	13.00
10/08/15	David Jimenez	Performing on site forensic collection.	15.00
10/09/15	Darielle Delgado	Backup and update documentation.	4.10
10/09/15	David Jimenez	Performing on site forensic collection.	10.00
10/12/15	Darielle Delgado	Backup and documentation.	6.10
10/12/15	David Jimenez	Performing on site forensic collection.	2.00
10/13/15	Darielle Delgado	Backup and update documentation.	3.80
10/13/15	Craig Fennell	Restore SQL backup file for entity Amkey. Review database structure and tables. Provide customers table to team for analysis and review. Confer with team.	2.25
10/13/15	David Jimenez	Performing on site forensic collection.	1.50
10/14/15	David Jimenez	Performing on site forensic collection.	3.00
10/15/15	David Jimenez	Performing on site forensic collection.	1.25
10/16/15	David Jimenez	Performing on site forensic collection.	1.50
10/19/15	Darielle Delgado	Evidence processing and raw data extraction.	2.60
10/20/15	David Jimenez	Resetting server passwords and reconfiguring servers.	8.50
10/21/15	Michael Bandemer	Direct and review IT support and analysis.	5.25

Page 3 of 4



To: Thomas Seaman c/o: Thomas Seaman Company RE: SEC v. US Fine Investments Arts Inc Page 4 of 4 Invoice # 36524

Client-Matter: 07733-011355

<u>Date</u>	<u>Name</u>	Description	<u>Hours</u>
10/21/15	David Jimenez	Resetting server passwords and reconfiguring servers.	8.25
10/22/15	Michael Bandemer	Direct and review IT support and analysis.	3.50
10/22/15	Darielle Delgado	Identify email database, and prepare listing of mailboxes.	2.80
10/22/15	David Jimenez	Resetting server passwords and reconfiguring servers. Resetting passwords on computers. Reconfiguring network.	10.50
10/23/15	David Jimenez	Resetting server passwords and reconfiguring servers. Resetting passwords on computers. Reconfiguring network. Database analysis and website analysis.	13.50
10/26/15	Michael Bandemer	Direct and review IT support and analysis.	0.50
10/26/15	David Jimenez	Imaging devices and documentation.	6.50
10/27/15	David Jimenez	Forensic imaging.	2.50
10/29/15	Michael Bandemer	Direct and review IT support and analysis.	0.75
10/30/15	Michael Bandemer	Direct and review IT support and analysis.	0.25
Professional Services			



Thomas Seaman Thomas Seaman Company 3 Park Plaza, Suite 550 Irvine, CA 92614

Via Email: tom@thomasseaman.com

December 18, 2015 Client-Matter: 7733-11355 Invoice #: 37312 Tax ID # 27-1451273

RE: SEC v. US Fine Investments Arts Inc

Services Rendered Through November 30, 2015

 Professional Services
 \$ 22,582.50
 USD

 Expenses Incurred
 6,879.38
 USD

 CURRENT CHARGES
 \$ 29,461.88
 USD

OUTSTANDING INVOICES

Invoice # 36524 - Dated 11/19/15 91,635.29

BALANCE DUE \$ 121,097.17 USD

PAYMENT IS DUE BY January 17, 2016

Please direct questions regarding this invoice to: Michael Bandemer at (619) 823-8867 or mbandemer@thinkbrg.com.

Please remit payment by check to:

Berkeley Research Group, LLC 2200 Powell Street, Suite 1200 Emeryville, CA 94608

Please remit payment by wire or ACH to:

Bank Name: PNC Bank, N.A. SWIFT: PNCCUS33ENJ ABA #: 031207607

Account Name: Berkeley Research Group, LLC

Account #: 8026286672 Reference: 37312

Remittance advices are to be sent to:

remitadvice@thinkbrg.com



To: Thomas Seaman c/o: Thomas Seaman Company RE: SEC v. US Fine Investments Arts Inc Page 2 of 3 Invoice # 37312

Client-Matter: 07733-011355

Services Rendered Through November 30, 2015

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	Rate	<u>Hours</u>	<u>Amount</u>
Managing Director			
Michael Bandemer	450.00	1.75	787.50
Senior Managing Consultant			
Craig Fennell	325.00	1.25	406.25
David Jimenez	325.00	55.75	18,118.75
Managing Consultant			
Darielle Delgado	300.00	10.90	3,270.00
Total Professional Services	_	69.65	22,582.50
EXPENSES			
Computer Software			396.48
Computer Supplies			773.05
Meals - Other (100% Deductible)			214.83
Travel - Airline			229.50
Travel - Hotel/Lodging			2,950.32
Travel - Mileage			59.80
Travel - Parking			127.20
Travel - Taxi, Car Rental, Toll, Train			999.07
In-House Costs: Technology, Fax, Phone, Supplies & Photocopies			1,129.13
Total Expenses			6,879.38



To: Thomas Seaman c/o: Thomas Seaman Company

Invoice # 37312 RE: SEC v. US Fine Investments Arts Inc **Client-Matter:** 07733-011355

Services Rendered Through November 30, 2015

DETAIL OF PROFESSIONAL SERVICES

<u>Date</u> 11/02/15	<u>Name</u> David Jimenez	<u>Description</u> Forensic imaging of remaining devices.	<u>Hours</u> 4.50
11/04/15	Craig Fennell	Work with IT team and restore SQL database and log file from client exported databases. Confer with team.	1.25
11/04/15	David Jimenez	USFIA database analysis.	2.50
11/10/15	Michael Bandemer	Support receiver with analysis and search of records	0.50
11/10/15	David Jimenez	Gathered statistics and provided brief narrative report.	1.50
11/16/15	David Jimenez	Processed computer images and searched for web based email accounts.	4.75
11/17/15	Michael Bandemer	Support receiver with analysis and search of records	0.25
11/17/15	Darielle Delgado	Process evidence and update for gmail messages.	1.10
11/17/15	David Jimenez	Processed computer images and searched for web based email accounts.	6.50
11/18/15	David Jimenez	Processed computer images and searched for web based email accounts.	5.50
11/19/15	Darielle Delgado	Process evidence and update for gmail messages.	1.10
11/20/15	Darielle Delgado	Process evidence and update for gmail messages.	1.10
11/23/15	David Jimenez	On site resetting of passwords. Database analysis	8.00
11/24/15	Michael Bandemer	Support receiver with analysis and search of records	0.50
11/24/15	Darielle Delgado	Process of evidence for analysis and searching	1.60
11/24/15	David Jimenez	On site resetting of passwords. Database analysis.	8.00
11/25/15	Darielle Delgado	Process of evidence for analysis and searching.	3.40
11/25/15	David Jimenez	Processing data and performing keyword searches.	6.00
11/30/15	Michael Bandemer	Support receiver with analysis and search of records	0.50
11/30/15	Darielle Delgado	Process evidence for analysis and searching.	2.60
11/30/15	David Jimenez	Processing data and performing keyword searches. Resetting passwords.	8.50
Professional S	Services		69.65

Page 3 of 3



Thomas Seaman Thomas Seaman Company 3 Park Plaza, Suite 550 Irvine, CA 92614

Via Email: tom@thomasseaman.com

January 25, 2016 Client-Matter: 7733-11355 Invoice #: 38166 Tax ID # 27-1451273

USD

RE: SEC v. US Fine Investments Arts Inc

Services Rendered Through December 31, 2015

 Professional Services
 \$ 28,581.25
 USD

 Expenses Incurred
 1,467.82
 USD

 CURRENT CHARGES
 \$ 30,049.07
 USD

OUTSTANDING INVOICES

Invoice # 36524 - Dated 11/19/15 91,635.29
Invoice # 37312 - Dated 12/18/15 29,461.88

BALANCE DUE

\$ 151,146.24

PAYMENT IS DUE BY February 24, 2016

Please direct questions regarding this invoice to: Michael Bandemer at (619) 823-8867 or mbandemer@thinkbrg.com.

Please remit payment by check to:

Berkeley Research Group, LLC 2200 Powell Street, Suite 1200 Emeryville, CA 94608

Please remit payment by wire or ACH to:

Bank Name: PNC Bank, N.A. SWIFT: PNCCUS33ENJ ABA #: 031207607

Account Name: Berkeley Research Group, LLC

Account #: 8026286672 Reference: 38166

Remittance advices are to be sent to:

remitadvice@thinkbrg.com



To: Thomas Seaman Company RE: SEC v. US Fine Investments Arts Inc

Page 2 of 4 Invoice # 38166

Client-Matter: 07733-011355

Services Rendered Through December 31, 2015

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	<u>Rate</u>	<u>Hours</u>	Amount
Senior Managing Consultant			
Craig Fennell	325.00	4.75	1,543.75
David Jimenez	325.00	56.00	18,200.00
Managing Consultant			
Darielle Delgado	300.00	18.10	5,430.00
Senior Associate			
Zhe Wang	235.00	14.50	3,407.50
Total Professional Services		93.35	28,581.25
EXPENSES			
Express Messenger/Shipping			38.75
In-House Costs: Technology, Fax, Phone, Supplies & Photocopies			1,429.07
Total Expenses			1,467.82



To: Thomas Seaman Company RE: SEC v. US Fine Investments Arts Inc

Page 3 of 4 Invoice # 38166

Client-Matter: 07733-011355

Services Rendered Through December 31, 2015

DETAIL OF PROFESSIONAL SERVICES

<u>Date</u> 12/01/15	<u>Name</u> Darielle Delgado	<u>Description</u> Reset login passwords.	<u>Hours</u> 8.00
12/01/15	David Jimenez	On site database analysis and resetting passwords.	8.00
12/02/15	Darielle Delgado	Reset login passwords.	8.00
12/02/15	David Jimenez	Coordinating code analysis, database analysis, translations, password cracking, and gmail identification and preservation.	9.75
12/03/15	Darielle Delgado	Email collection.	2.10
12/03/15	David Jimenez	Coordinating code analysis, database analysis, translations, password cracking, and gmail identification and preservation.	6.50
12/03/15	Zhe Wang	Translated USFIA web page and database data.	2.00
12/04/15	Craig Fennell	Review tables and fields, and develop queries to identify members. Confer.	2.50
12/04/15	David Jimenez	Coordinating code analysis, database analysis, translations, password cracking, and gmail identification and preservation.	4.50
12/04/15	Zhe Wang	Translated USFIA web page and database data.	6.75
12/07/15	David Jimenez	Coordinating code analysis, database analysis, translations, password cracking, and gmail identification and preservation.	5.25
12/08/15	David Jimenez	Coordinating code analysis, database analysis, translations, password cracking, and gmail identification and preservation.	5.00
12/08/15	Zhe Wang	Translated USFIA web page and database data.	2.25
12/09/15	David Jimenez	Coordinating code analysis, database analysis, translations, password cracking, and gmail identification and preservation.	4.50
12/09/15	Zhe Wang	Translated USFIA web page and database data.	3.50
12/10/15	David Jimenez	Reviewing translations, database analysis, and password cracking.	3.25
12/11/15	David Jimenez	Coordinating code analysis, database analysis, translations, password cracking, and gmail identification and preservation.	3.00
12/23/15	Craig Fennell	Prepare deliverable of member listing from USFIA database. Confer regarding results.	2.25
12/23/15	David Jimenez	Database analysis. Generated preliminary report.	3.75



To: Thomas Seaman c/o: Thomas Seaman Company RE: SEC v. US Fine Investments Arts Inc **Page** 4 of 4 **Invoice** # 38166

Client-Matter: 07733-011355

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>
12/30/15	David Jimenez	Continued password cracking and gmail preservation.	2.50
Professional S	Carvicas	•	93.35
Professional 3	ervices	·	33.33



Thomas Seaman Thomas Seaman Company 3 Park Plaza, Suite 550 Irvine, CA 92614

Via Email: tom@thomasseaman.com

February 16, 2016 Client-Matter: 7733-11355 Invoice #: 38805 Tax ID # 27-1451273

RE: SEC v. US Fine Investments Arts Inc.

Services Rendered Through January 31, 2016

BALANCE DUE

Professional Services Expenses Incurred	\$ 1,225.00 4,073.20	USD
CURRENT CHARGES	\$ 5,298.20	USD
OUTSTANDING INVOICES		
Invoice # 36524 - Dated 11/19/15	91,635.29	
Invoice # 37312 - Dated 12/18/15	29,461.88	
Invoice # 38166 - Dated 01/25/16	30,049.07	

PAYMENT IS DUE BY March 17, 2016

Please direct questions regarding this invoice to: Michael Bandemer at (619) 823-8867 or mbandemer@thinkbrg.com.

Please remit payment by check to:

Berkeley Research Group, LLC 2200 Powell Street, Suite 1200 Emeryville, CA 94608

Please remit payment by wire or ACH to:

Bank Name: PNC Bank, N.A. SWIFT: PNCCUS33ENJ ABA #: 031207607

Account Name: Berkeley Research Group, LLC

\$ 156,444.44

USD

Account #: 8026286672 Reference: 38805

Remittance advices are to be sent to:

remitadvice@thinkbrg.com



To: Thomas Seaman Company RE: SEC v. US Fine Investments Arts Inc.

Page 2 of 3 Invoice # 38805

Client-Matter: 07733-011355

Services Rendered Through January 31, 2016

	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Senior Managing Consultant			
David Jimenez	350.00	3.50	1,225.00
	<u>-</u>		
Total Professional Services		3.50	1,225.00
EVDENICEC			
EXPENSES			
Meals - Other (100% Deductible)			171.43
Telephone, Fax and Internet			9.95
Travel - Airline			1,771.92
Travel - Hotel/Lodging			1,075.90
Travel - Mileage			121.90
Travel - Parking			63.00
Travel - Taxi, Car Rental, Toll, Train			797.85
In-House Costs: Technology, Fax, Phone, Supplies & Photocopies			61.25
Total Expenses			4,073.20



To: Thomas Seaman Company RE: SEC v. US Fine Investments Arts Inc.

Page 3 of 3 **Invoice #** 38805

Client-Matter: 07733-011355

Services Rendered Through January 31, 2016

DETAIL OF PROFESSIONAL SERVICES

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>
01/28/16	David Jimenez	Generated report of list of investors.	3.50
Professiona	l Services		3.50

EXHIBIT B



Michael R. Bandemer

CPA, EnCE, CFF, CMA, CITP

Managing Director

P: 619.823.8867 mbandemer@thinkbrg.com

12636 High Bluff Drive, Suite 400 San Diego, CA 92130

Summarv

Michael Bandemer is a Managing Director with Berkeley Research Group and leader of its Discovery and Technology Practice which specializes in e-discovery, digital forensics and investigations. Prior to joining Berkeley Research Group, Mr. Bandemer was a Managing Director with Huron Legal, an international advisory and business services firm, and previously the national practice leader of LECG's Legal Technology and Analytics Consulting group (LTAC) which specialized in e-discovery, digital forensics and data analytics and provided strategic consulting, expert testimony and services to corporations and law firms across all phases of discovery.

Mr. Bandemer has performed or supervised the preservation, forensic collection and analysis of electronically stored information ("ESI") from corporate networks, databases, personal computers (Mac and PC), phones, tablets, external storage devices, social media, archives, cloud providers and other digital storage media in hundreds of matters ranging from internal and federal investigations to commercial disputes. Mr. Bandemer advises both corporate and law firm clients and provides expert testimony regarding various information management and legal technology issues including internal discovery processes, procedures, best practices, evidence preservation and collection, computer forensics, electronic discovery, complex data analytics, and other information technology issues.

Mr. Bandemer has qualified in court as an expert in e-discovery and computer forensics and provided testimony at deposition, arbitration and federal and state court. He has been selected as an independent e-discovery expert and has served as a 30(b)(6) corporate representative, special master and court appointed third-party neutral in various engagements. In these matters Mr. Bandemer has addressed discovery issues concerning records management, accessibility, burden, preservation, collection, spoliation, search and production.

The diverse range of matters Mr. Bandemer has assisted with includes misappropriation of trade secrets, internal investigations, breach of contract, business interruption, employment disputes, fraud investigations, securities, and wage and hour class actions among others. He has experience in a broad spectrum of industries including high technology, financial services, construction, professional services, gaming, hospitality, entertainment, oil and gas, government, retail, auto, railroad, entrepreneurial business, manufacturing, and real estate.

Professional Experience

Berkeley Research Group	Managing Director	2014 to Present
Huron Consulting Group	Managing Director	2011 to 2014
LECG (Mack Barclay Inc.)	Partner	1994 to 2011
Peterson Consulting, L.P.	Senior Consultant	1990 to 1994
Phelps Dodge Corporation	Associate	1988 to 1990



Education and Certifications

Bachelor of Science in Finance, Arizona State University 1990, *cum laude* graduate.

Member of the Golden Key Honor Society

Selected for *Who's Who Among Students in American Universities and Colleges*Served as the chief budgeting assistant for the Associated Student Body (1989–1990)

Certified Public Accountant, 1998
Certified Management Accountant, 1995
Certified Information Technology Professional, 2001
Certified EnCase Computer Examiner, 2003
Certified Financial Forensics, 2008

Continuing education as lecturer and participant.

Patents Held

System and Method for Managing Observational Information Items
United States 7,107,278 B1, Issued September 12, 2006
Structural relational database and interface developed for managing electronic information, photos, and digitized field drawings/notes and other information in construction defect matters.

Professional Associations

High Technology Crime Investigation Association
The Sedona Conference Working Group:

Electronic Document Retention and Production
California State Society of Certified Public Accountants
Association of Certified Fraud Examiners
Association of Records Managers & Administrators
Association for Information and Image Management

American Institute of Certified Public Accountants

Board Experience

Institute of Management Accountants

President - High Technology Crimes Investigation Association (HTCIA); San Diego Chapter Youth Tennis San Diego-Board of Directors, Past President



Geoffrey Brown

Director

P: 619.717.0407 gbrown@thinkbrg.com

12636 High Bluff Drive, Suite 400 San Diego, CA 92130

Summary

Geoff has more than 15 years of experience in information technology and over 10 years of experience in digital forensic collection and analysis, data analytics investigations, and eDiscovery. Geoff has performed hundreds of computer forensic investigations, performed onsite analysis of cyber security breaches, and has assisted both corporate and law firm clients with the preservation and management of large volumes of data in response to civil litigation, government inquiries and internal investigations. He has significant experience leading highly sensitive and complex matters ranging from misappropriation of trade secrets, internal investigations, breach of contract, business interruption, employment disputes, fraud investigations, securities, and wage and hour class actions among others in a wide variety of industries. He brings extensive success and experience in providing cost effective, defensible analysis, and consulting in areas including:

- · Forensic preservation including computers, servers, smart phones
- · Forensic analysis on Windows and Apple operating systems
- IP theft and employee investigations
- Time-line analysis and reporting
- Server log analysis
- Incident Response computer forensics
- Data recovery
- Data Analysis
- E-discovery processing, search-term analysis, and review consulting
- Project management
- Expert witness testimony

Education

Business Administration, B.A. University of Anglia UK, 1998 EnCase Certified Examiner, EnCE Certified Computer Forensics Examiner, CFCE Microsoft Certified Systems Engineer, MCSE Cisco Certified Network Associate, CCNA (expired)

Professional Experience

Director at Berkeley Research Group LLC	2014-present
Manager at Huron Consulting Group	2013-2014
Senior Manager of eDiscovery and Forensics	2012-2013
Managing Consultant at LECG	2006-2012
Network manager at Mack Barclay	2004-2006
Systems Administrator at Cardiff Software	2002-2004
Systems Administrator at Zoomedia	2001-2002



Expert Testimony Experience

Date	Case Name	Venue	Туре
10/01/2011	AMRON INTERNATIONAL DIVING SUPPLY, INC. v. HYDROLINX DIVING COMMUNICATION, INC.,	US District Court - Southern District of California	Declaration
02/28/2012	NUVASIVE, INC v. WILLIAM BART AND JAMES GREENE	US District Court - Southern District of California	Declaration
03/19/2012	BECKMAN COULTER INC v. LIFE TECHNOLOGIES	Cook County, Illinois	Declaration
03/27/2012	FUGUE SCIENCE GROUP, LLC v. CLIFFORD T. LEWIS	American Arbitration Association of San Diego	Declaration
05/13/2012	FUGUE SCIENCE GROUP, LLC v. CLIFFORD T. LEWIS	American Arbitration Association of San Diego	Arbitration
02/5/2013	ADAMS GOLF, INC v. CALLAWAY GOLF COMPANY and TIM REED	Collin County, Texas	Declaration
02/26/2013	ADAMS GOLF, INC v. CALLAWAY GOLF COMPANY and TIM REED	Collin County, Texas	Deposition
03/1/2013	ADAMS GOLF, INC v. CALLAWAY GOLF COMPANY and TIM REED	Collin County, Texas	Hearing
04/24/2013	HALLIBURTON ENERGY SERVICES INC v. DRILFORMANCE LLC	Harris County, Texas	Declaration
11/03/2014	MOHAMMED MOHIDEEN v. CALNET INC	US District Court - Southern District of California	Deposition



David Jimenez

EnCE

Senior Managing Consultant

D 713.493.2553 | M 281.217.1310 djimenez@thinkbrg.com 700 Louisiana Street, Suite 1750 Houston, TX 77002

Summary

David Jimenez is a Senior Managing Consultant with Berkeley Research Group. Prior to joining BRG, he was a Manager with Huron Consulting Group. He has over 12 years of experience and expertise advising both corporate and law firm clients on information technology issues. He specializes in performing legally defensible electronic collections and conducting digital forensic investigations, e-discovery project management and incident response.

Mr. Jimenez has utilized his technical skills to collect and analyze data from a broad spectrum of sources including geolocation and seismic equipment, physical access control systems, medical devices, mainframes, and air quality monitoring instruments.

Mr. Jimenez has performed hundreds of computer forensic investigations, performed onsite analysis of cyber security breaches, and has assisted legal counsel with the preservation and management of large volumes of data in response to civil litigation, government inquiries and internal investigations.

Professional Experience

•	2014 - Present	Berkeley Research Group LLC
•	2012 – 2014	Huron Consulting Group
•	2008 – 2012	LCG Discovery Experts
•	2007 – 2008	Huron Consulting Group
•	2005 – 2007	Baker Robbins & Co.
•	2002 – 2005	Beirne, Maynard & Parsons L.L.P.

Education and Certifications

- EnCase Certified Examiner (ENCE), 2013
- 60+ course hours at San Jacinto College, 2003
- Cisco Certified Network Associate (CCNA), 2000
- Licensed Private Investigator
- Native Spanish Speaker

Expert Testimony

June 2014: US District Court Southern District of Texas: Vincent Edward Roach Sr. vs. Compass

Manufacturing International LLC

July 2010: 61st District Court of Texas: Catalyst Services Inc. vs. Caskey, Paul

March 2010: 113th District Court of Texas: Amerigas Propane vs. Texas Star Propane Inc.

December 2008: 61st District Court of Texas: Square D Company vs. Dashiell LLC



Dean Christopher

CEDS

Senior Managing Consultant

D: 312.429.7952
M: 708.310.0023
dchristopher@thinkbrg.com

181 W. Madison, Suite 2950 Chicago, IL 60602

Summary

Dean Christopher has more than 9 years of experience assessing client discovery needs and developing tailored solutions to achieve high levels of cost savings and efficiencies. Dean works extensively with corporate legal and IT departments to design and implement practical and sustainable solutions to address the challenges associated with the constantly evolving discovery landscape. He focuses on assisting clients in identifying opportunities for optimization, from legal hold issuance through data collection, processing, document review, and production.

Prior to joining Berkeley Research Group, Dean was a manager within the discovery consulting practice at Huron Consulting Group. Dean works with clients in a variety of industries including telecommunications, energy, pharmaceutical, and financial services, with a focus on the strategic use of technology, people, and processes. Representative examples of his engagement experience include:

- Evaluated the in-house data collection and processing practices of a Fortune 50 Financial Services company to identify areas for cost savings, increased defensibility, and enhanced process efficiencies.
- Conducted an end-to-end discovery readiness assessment for a Fortune 50 Energy company, including review
 of existing staffing, discovery workflows, and associated technologies. Drafted business requirements for legal
 hold and collection workflows and led the RFP process for tool selection.
- Led the implementation of the Exterro Fusion (Legal Hold) and Zeta (Collection) platforms for a global Oil & Gas company. Project tasks included business process design, systems testing, and training rollout to the law department and IT users.
- Collaborated with in-house counsel, external counsel, and vendors, while serving as the central point of
 coordination for discovery management, from collection through production, on 30+ legal matters for a Fortune
 10 Energy company.
- Managed the technical phase of an IBM Atlas Legal Hold implementation for a Fortune 50 Financial Services company including the development of customized HR and organizational data feeds.
- Developed workflows pertaining to multiple phases of discovery for a global energy company. Areas of focus
 included terminated employee workflows, predictive coding QC sampling, and exception handling of technical
 issue files.
- Conducted an enterprise collection tool evaluation for a global energy company which included compiling a
 vendor/tool comparison matrix, scheduling and scoring proof of concept evaluations, and creating and executing
 upon test plans for the proposed solutions.

Professional Experience

Berkeley Research Group Senior Managing Consultant 2015 to Present Huron Consulting Group Manager 2006 to 2015



Education and Certifications

Bachelor of Science in Management Information Systems, DePaul University, 2006
Bachelor of Science in Finance, DePaul University, 2006
Certified E-Discovery Specialist, CEDS, 2015

Professional Associations

Association of Certified E-Discovery Specialists (ACEDS)



Craig Fennell

Senior Manager

P: 619.200.8221 cfennell@thinkbrg.com

12707 High Bluff Drive, Suite 200 San Diego, CA 92130

Summary

Craig holds a senior role in the Discovery and Technology Services team with over 15 years of consulting experience on a variety of client engagements relating to management information systems, forensic investigations, asset tracing, bankruptcy and fraud investigations, and lost profit/commercial litigation matters. His responsibilities include programming and analytics utilizing a variety of relational database packages to manage large databases, convert and normalize source data, analyze financial statements, and create complex financial models in support of complex litigation and commercial disputes.

Prior to joining Berkeley Research Group, Craig was a Manager at Huron Consulting Group in the Digital Forensics and Expert Services group where his responsibilities included information management and analyses in support of forensic investigations, electronic discovery and data analytics matters. Craig has tremendous experience working in a variety of database programs including but not limited to: Microsoft SQL, Microsoft Access, VBA, VBScript, MSSQL, LexisNexis LAW PreDiscovery, MS Office, Monarch, OmniPage, Concordance, Relativity, MS Access, and NUIX eDiscovery. His experience runs the gamut of industries including, pharmacological, oil and gas, healthcare, hospitality and the specialized databases and idiosyncrasies commensurate with those industries.

Education

B. S in Finance, University of Arizona Masters of Business Administration, Arizona State University

Professional Experience

Senior Manager at Berkeley Research Group LLC	2014-present
Manager at Huron Consulting Group	2011-2014
Senior Consultant at LECG	2005-2011
Supervising Senior Consultant at Mack Barclay	2001-2005
Senior Consultant at Tucker Alan Inc.	1996-2001
Accountant and Financial Analyst at Norwest Bank, AZ	1991-1996



Darielle D. Delgado

Managing Consultant

P: 619.318.0851 ddelgado@thinkbrg.com

12707 High Bluff Drive, Suite 200 San Diego, CA 92130

Summary

Darielle Delgado, a Managing Consultant in San Diego, is an experienced technologist with more than 10 years of experience in the electronic discovery field. His expertise includes data analytics, computer forensics, electronic discovery, investigations, and incident response. Darielle's engagement history includes matters relating to intellectual property, internal investigations, bankruptcy, revenue recognition, racial discrimination and SEC inquiries and investigations.

Darielle has provided network connectivity support, discovery assistance, and forensic data acquisitions services in varied matters and industries. He has extensive training in the use of forensic software and computer investigations. Darielle assists in the development of custom software applications and data organization solutions providing data analysis, conversion, recovery, integration, and reporting services to both law firms and business clients.

Professional Experience

Berkeley Research Group Managing Consultant 2014 to Present
Huron Consulting Group Associate 2011 to 2014
Mack|Barclay Inc. Consultant 2000 to 2011

Education and Certifications

Bachelor of Science, Business Administration with emphasis in Information Technology San Diego State University

EnCase Certified Examiner, EnCE